

UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
ANDREW R. VARA  
UNITED STATES TRUSTEE, REGIONS 3 AND 9  
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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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In re:	:	Chapter 11
	:	
Alexandre Dacosta and	:	Case No. 22-18303(JKS)
Viviane Antunes, <i>et al.</i> <sup>1</sup> ,	:	(Jointly Administered)
	:	
Debtors.	:	Hearing Date: Sept. 26, 2023 at 10:00 AM
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**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION OF THE UNITED STATES TRUSTEE FOR AN ORDER  
CONVERTING THE CASE OF BAV AUTO, LLC TO CHAPTER 7 OR, IN THE  
ALTERNATIVE, DISMISSING THE CASE PURSUANT 11 U.S.C. § 1112(b)**

**TO: ALL PERSONS ON ATTACHED CERTIFICATE OF SERVICE**

**PLEASE TAKE NOTICE** that the United States Trustee will move before the Honorable John K. Sherwood on September 26, 2023 at 10:00 a.m., or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, District of New Jersey, 50 Walnut Street, Newark, New Jersey 07102, for an Order Converting the Case of BAV Auto, LLC to Chapter 7 or, in the alternative, Dismissing the Case Pursuant to 11 U.S.C. §1112 (b) and for such other and further relief as this Court deems just and appropriate.

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<sup>1</sup> The jointly administered Debtors are Alexandre Dacosta and Vivianne Antunes, having SSNs with the last four digits of 2325 and 0411, respectively, and BAV Auto, L.L.C., having a TIN with the last four digits 7479.

**PLEASE TAKE FURTHER NOTICE** that any papers in opposition to the Motion must be filed with the Court and served upon the United States Trustee no later than seven days in advance of the hearing date pursuant to District of New Jersey Local Bankruptcy Rule 9013-2(a)(2). If opposing papers are not filed and served within the required time, the Motion will be decided on the papers pursuant to District of New Jersey Local Bankruptcy Rule 9013-3(d), and an Order either (i) Converting the Chapter 11 Case of BAV Auto, LLC to a Chapter 7 Case, or (ii) Dismissing the Chapter 11 Case of BAV Auto, LLC, may be signed and entered in the Court's discretion.

ANDREW R. VARA  
UNITED STATES TRUSTEE  
REGIONS 3 AND 9

/s/ Peter J. D'Auria  
Peter J. D'Auria  
Trial Attorney

DATED: August 25, 2023